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*Attorneys for Plaintiffs Horizon Pharma,  
Inc., Horizon Pharma USA, Inc., and  
Pozen Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

HORIZON PHARMA, INC., HORIZON  
PHARMA USA, INC., and POZEN INC.,

Plaintiffs,

v.

ACTAVIS LABORATORIES FL., INC., and  
ACTAVIS PHARMA, INC.,

Defendants.

Civil Action Nos. 13-cv-03038, 15-03322,  
15-08523, 15-08524, 16-04916 and  
16-00426 (MLC-DEA)

**NOTICE OF JOINT MOTION TO SEAL**

MOTION RETURN DATE: FEBRUARY 21,  
2017

*Electronically Filed*

**PLEASE TAKE NOTICE** that on February 21, 2017, or as soon thereafter as counsel may be heard, Plaintiffs Horizon Pharma, Inc., Horizon Pharma USA, Inc., and Pozen Inc. (collectively, "Plaintiffs") and Defendants Actavis Laboratories FL, Inc., and Actavis Pharma, Inc. (collectively, "Actavis") will appear before the Honorable Douglas E. Arpert, U.S.M.J., sitting at the United States District Court for the District of New Jersey, Clarkson S. Fisher Federal Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, and will move this Court pursuant to Local Civil Rule 5.3(c), for the entry of an Order to Seal the following:

1. Portions of Actavis' Highly Confidential Memorandum of Law in Support of Expedited Motion to Compel, filed on Dec. 19, 2016;
2. Portions of Highly Confidential Declaration of Colman B. Ragan, filed on Dec. 19, 2016;
3. The entirety of Exhibits 1-22 to Declaration of Colman B. Ragan, filed on Dec. 19, 2016;
4. The Report and Recommendation, dated December 22, 2016;
5. Portions of Actavis' Response to Plaintiffs' Objections to the December 22, 2016 Report and Recommendation Granting Motion to Compel Enforcement of the Settlement Agreement, filed on December 29, 2016;
6. The Court's Memorandum Opinion, dated December 30, 2016;
7. Portions of Actavis's January 6, 2017 Letter to the Hon. Mary L. Cooper, U.S.D.J.
8. Portions of Plaintiffs' Opposition to Actavis's Motion to Compel Enforcement of the Settlement Agreement, filed on December 21, 2016;
9. Portions of Declaration of Stephen M. Hash, filed on December 21, 2016;
10. The entirety of Exhibits 1-5 to Declaration of Stephen M. Hash;
11. Portions of Declaration of Lauren L. Stevens, filed on December 21, 2016;
12. Portions of Declaration of Eric L. Trachtenberg, filed on December 21, 2016;
13. Portions of Horizon's Objections to Magistrate Judge's Report and Recommendation on Defendant's Motion to Compel Enforcement of the Settlement Agreement, filed on December 28, 2016;

14. Portions of Pozen's Objections to Magistrate Judge's Report and Recommendation on Defendant's Motion to Compel Enforcement of the Settlement Agreement, filed on December 28, 2016.

**PLEASE TAKE FURTHER NOTICE THAT** the parties shall rely upon the accompanying Declaration of Liza M. Walsh; Declaration of John E. Flaherty; Proposed Findings of Fact and Conclusions of Law, and all papers submitted herewith. A proposed form of Order is also submitted for the Court's consideration.

Respectfully submitted,

Dated: January 27, 2017

By:s/Liza M. Walsh

By:s/ John E. Flaherty

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